

February 16, 2011

Federal Communications Commission: CG Docket No. 10-210

I am a career disability attorney and advocate. My comments are in reply to the comments filed by the American Association of the Deaf-Blind (AADB) on February 4, 2011 in response to the Commission's Notice of Proposed Rulemaking regarding the National Deaf-Blind Equipment Distribution Program. My reply comments are slightly past due, I respectfully request that the Commission accept them nevertheless.

I join many in commending the Commission for its expeditious and quality work on this issue. I had a concern with the Commission's tentative conclusion that eligibility of disability be verified by a "practicing professional." I am deaf, not deaf-blind, but as a healthy, fully capable and employed individual, have no "professionals" servicing me nor do I have any desire for them to do so. The examples of "professionals" listed by the Commission are virtually all medical professionals. This adherence to an antiquated "medical model" view of disability flies in face of disability defined as a social and environmental concept as exemplified in the UN Convention on the Rights of People with Disabilities signed by President Obama.

I perceive AADB's comments as attempting to address this issue by suggesting that verification could also be from a "community based service provider." I wanted to strongly endorse this suggestion and look to define the concept broadly to at least permit any disability oriented organization with direct knowledge of the individual to attest to her or his disability. Furthermore, the Commission should enable individuals to verify using other independent, knowledgeable and objective sources who are not themselves professionals or service providers.

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